

July 16, 2001

Rich Purcell
Capitol City Container Corporation
8240 Zionsville Road, Park 100
Indianapolis, In. 46268

Re: Registered Construction and Operation Status,
097-12964-00037

Dear Mr. Purcell:

The application from Capitol City Container Corporation received on November 14, 2000 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5 it has been determined that the following printer and assembler of corrugated and solid fiber boxes, to be located at 8240 Zionsville Road, Park 100, Indianapolis, Indiana 4626, is classified as registered:

- (a) 3100 Flexo Press with Fuller Gluer, identified as EU1, installed in 1999, with a maximum line speed of 1525 feet per minute and a maximum printing width of 52 inches, using no control equipment, and exhausting inside the building.
- (b) Work Horse Flexo Press/Grant Die Cutter, identified as EU2, installed in 1999, with a maximum line speed of 1687.5 feet per minute and a maximum printing width of 66 inches, using no control equipment, and exhausting inside the building.
- (c) 2100 Flexo Press, identified as EU3, installed in 1995, with a maximum line speed of 1583.33 feet per minute and a maximum printing width of 28 inches, using no control equipment, and exhausting inside the building.
- (d) Emba Flexo Press with Fuller Gluer, identified as EU4, installed in 2000, with a maximum line speed of 2466.67 feet per minute and a maximum printing width of 26 inches, using no control equipment, and exhausting inside the building.
- (e) Langston Letter Press, identified as EU5, installed in 1995, with a maximum capacity of with a maximum line speed of 1525 feet per minute and a maximum printing width of 52 inches, using no control equipment, and exhausting inside the building.
- (f) Jumbo Slot Feed Letter Press, identified as EU6, installed in 1995, with a maximum line speed of 1525 feet per minute and a maximum printing width of 52 inches, using no control equipment, and exhausting inside the building.
- (g) Corrugated Bailer, identified as EU7, installed in 1995, with a maximum capacity of approximately 4,511 tons of corrugated bailed, using no control equipment, and exhausting inside the building.
- (h) Band Saw, identified as EU8, installed in 1995, with an unknown maximum capacity, using no control equipment, and exhausting inside the building.
- (i) Natural Gas Fired Space Heater, identified as EU9, installed in 1995, with a maximum capacity of 1.296 MMBtu/hr, using no control equipment, and exhausting inside the building.

The following conditions shall be applicable:

Pursuant to IAPCB Regulation 2 (Permits) and 326 IAC 2-5.5-4 (Registration Content), an authorized individual shall provide an annual notice to the Environmental Resources Management Division and the Office of Air Quality that the source is in operation and in compliance with this Registration pursuant to state regulation 326 IAC 2-5.5-4(a)(3).

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Pursuant to 326 IAC 6-3-2 (Process Operations), Interpolation of the data for all PM emitting units (EU7 and EU8) shall be accomplished by use of the equation for the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

PM emissions from EU7 shall not exceed 2.62 lbs per hour, and PM emissions from EU8 shall not exceed 0.04 lbs per hour.

Pursuant to 326 IAC 1-2-59, process weight does not include liquid or gaseous fuels, therefore 326 IAC 6-3-2 does not apply to EU9.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Environmental Resources Management Division
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the City of Indianapolis Environmental Resources Management Division (ERMD) and Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Daniel B. Dovenbarger, Administrator
Environmental Resources Management Division (ERMD)
City of Indianapolis

DRA

cc: file (2 copies)
Mindy Hahn, IDEM

Registration Annual Notification

This form should be used to comply with the notification requirements under **326 IAC 2-5.1-2(f)(3) or 326 IAC 2-5.5-4(a)(3)**

Company Name:	Capitol City Container Corporation
Address:	8240 Zionsville Road, Park 100
City:	Indianapolis
Authorized individual:	Rich Purcell
Phone #:	317-875-0290
Registration #:	097-12964-00037

I hereby certify that Capitol City Container Corporation is still in operation and is in compliance with the requirements of Registration 097-12964-00037.

Name (typed):
Title:
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Indianapolis Environmental Resources Management Division
Technical Support Document (TSD) for a New Source Construction
and Registration**

Source Background and Description

Source Name: Capitol City Container Corporation
Source Location: 8240 Zionsville Road, Park 100, Indianapolis, In. 46268
County: Marion
SIC Code: 2653
Operation Permit No.: 097-12964-00037
Permit Reviewer: Dana Armstrong

The Office of Air Quality (OAQ) and the City of Indianapolis Environmental Resources Management Division (ERMD) have reviewed an application from Capitol City Container Corporation relating to the construction and operation of a printer and assembler of corrugated and solid fiber boxes.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) 3100 Flexo Press with Fuller Gluer, identified as EU1, installed in 1999, with a maximum line speed of 1525 feet per minute and a maximum printing width of 52 inches, using no control equipment, and exhausting inside the building.
- (b) Work Horse Flexo Press/Grant Die Cutter, identified as EU2, installed in 1999, with a maximum line speed of 1687.5 feet per minute and a maximum printing width of 66 inches, using no control equipment, and exhausting inside the building.
- (c) 2100 Flexo Press, identified as EU3, installed in 1995, with a maximum line speed of 1583.33 feet per minute and a maximum printing width of 28 inches, using no control equipment, and exhausting inside the building.
- (d) Emba Flexo Press with Fuller Gluer, identified as EU4, installed in 2000, with a maximum line speed of 2466.67 feet per minute and a maximum printing width of 26 inches, using no control equipment, and exhausting inside the building.
- (e) Langston Letter Press, identified as EU5, installed in 1995, with a maximum capacity of with a maximum line speed of 1525 feet per minute and a maximum printing width of 52 inches, using no control equipment, and exhausting inside the building.
- (f) Jumbo Slot Feed Letter Press, identified as EU6, installed in 1995, with a maximum capacity of 1525 feet per minute and a maximum printing width of 52 inches, using no control equipment, and exhausting inside the building.

- (g) Corrugated Bailer, identified as EU7, installed in 1995, with a maximum capacity of approximately 4,511 tons of corrugated bailed, using no control equipment, and exhausting inside the building.
- (h) Band Saw, identified as EU8, installed in 1995, with an unknown maximum capacity, using no control equipment, and exhausting inside the building.
- (i) Natural Gas Fired Space Heater, identified as EU9, installed in 1995, with a maximum capacity of 1.296 MMBtu/hr, using no control equipment, and exhausting inside the building.
- (j) Stick welding and oxyacetylene cutting for emergency repairs only.

Unpermitted Emission Units and Pollution Control Equipment

Source wide emissions for Particulate Matter (PM) and VOCs exceed exemption thresholds specified in 326 IAC 2-1.1-3, therefore the source was subject to registration requirements pursuant to 326 IAC 2-5.1-2. The Permittee constructed and operated the source without a permit prior to this registration.

Existing Approvals

There are no existing permits for this source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
na					

Enforcement Issue

- (a) ERMD and IDEM, OAQ are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) ERMD and IDEM, OAQ are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 14, 2000 .

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, on pages 1 through 11 of 11.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	5.73
PM-10	5.73
SO ₂	0.003
VOC	22.68
CO	0.13
NO _x	0.95

HAP's	Potential To Emit (tons/year)
MIBK	0.09
Methanol	0.19
Ethylene Glycol	0.01
TOTAL	0.29

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for all pollutants; therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) Affected facilities subject to 40 CFR 60 Subpart QQ (Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing) applicability are publication rotogravure printing presses. All units used by the source are flexographic or letterpress printing presses. None of these presses use a gravure cylinder such as is defined in Subpart QQ, so none of the facilities are publication rotogravure printing presses. 40 CFR 60 Subpart QQ is not applicable to this source. No other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are applicable to this source.
- (b) An affected facility which falls under 40 CFR 63 Subpart KK (National Emissions Standards for the Printing and Publishing Industry) applicability must meet the requirement of being a "new and existing facility that is a major source of hazardous air pollutant (HAP) as defined in 40 CFR 63.2." This is stated in 40 CFR 63.820. The source is not a major source of HAP as defined in 40 CFR 63.2, and therefore 40 CFR Subpart KK does not apply to the source. No other National Emissions Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR 63) are applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-5.1-2 (Registrations)

Since the source wide emissions for PM and VOCs are greater than 5 tons per year but less than 25 tons per year for this new source, section 326 IAC 2-5.1 applies to this source, and it will be a Registration.

326 IAC 2-5.5-4(Registration Content)

Pursuant to IAPCB Regulation 2 (Permits) and 326 IAC 2-5.5-4 (Registration Content) An authorized individual shall provide an annual notice to the Environmental Resources Management Division and the Office of Air Quality that the source is in operation and in compliance with this Registration pursuant to state regulation 326 IAC 2-5.5-4(a)(3).

326 IAC 2-6 (Emission Reporting)

This source is located in Marion County, the potential to emit VOC and NO_x is less than ten (10) tons per year and its potential to emit PM is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5 (Opacity Limitations)

The Opacity regulation 326 IAC 5-1 is generally applicable to all point sources of emissions. Since the source is located in Marion County, and is not located in the areas of Marion County referred to in 326 IAC 5-1-5, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (New Source Toxics Control)

The source is not subject to 326 IAC 2-4.1 since it is not a major source of HAPs as defined by 40 CFR 63.41.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Interpolation of the data for all PM emitting units (EU7 and EU8) shall be accomplished by use of the equation for the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

PM emissions from EU7 shall not exceed 2.62 lbs per hour, and PM emissions from EU8 shall not exceed 0.04 lbs per hour.

Pursuant to 326 IAC 1-2-59, process weight does not include liquid or gaseous fuels, therefore 326 IAC 6-3-2 does not apply to EU9.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Emission units EU1, EU2, EU3, EU4, EU5, and EU6 are exempt from this rule since their combined potential to emit is less than 25 tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

Emission units EU1, EU2, EU3, and EU4 are exempted from this rule since they meet the emissions limitations contained in 326 IAC 8-5-5, and are flexographic operations.

326 IAC 8-5-5 (Graphics Arts Operations)

Emission units EU1, EU2, EU3, EU4, EU5, and EU6 are exempted from this rule since they are new sources installed after November 1, 1980 and have potential emissions of less than 25 tons per year.

Conclusion

The operation of this printer and assembler of corrugated and solid fiber boxes shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 097-12964-00037.

Appendix A: Emission Calculations Emission Summary

Company Name: Capitol City Container Corporation
Address City IN Zip: 8240 Zionsville Road, Park 100
Reg# 097-12964-00037
Plt ID: 097-0037
Reviewer: Dana Armstrong
Date: 19-Jul-01

Emission Unit ID	PM	PM10	SO2	NO x	VOC	CO	MIBK	Methanol	Ethylene Glycol
EU1	-	-	-	-	5.99	-	0.025489	0.0509779	
EU2	-	-	-	-	8.25	-	0.035123	0.0702464	
EU3	-	-	-	-	3.28	-	0.013978	0.027956	
EU4	-	-	-	-	4.75	-	0.020225	0.0404502	
EU5	-	-	-	-	0.24732	-			0.00804
EU6	-	-	-	-	0.12366	-			0.00402
EU7	4.5114	4.5114	-	-	-	-			
EU8	1.176155	1.176155	-	-	-	-			
EU9	0.042295	0.042295	0.003339	0.94608	0.030608	0.133564			
Totals	5.73	5.73	0.00	0.95	22.68	0.13	0.09	0.19	0.01

HAPs
0.076467
0.10537
0.041934
0.060675
0.00804
0.00402
-
-
-
0.30